

**Baker & Hostetler LLP**  
45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201

**Presentment Date: April 22, 2022**  
**Time: 12:00 p.m.**

**Objections Due: April 21, 2022**  
**Time: 5:00 p.m.**

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

FAIRFIELD PAGMA ASSOCIATES, LP, a New  
York limited partnership, SEYMOUR KLEINMAN,  
ESTATE OF MARJORIE KLEINMAN A/K/A  
MARJORIE HELENE KLEINMAN, BONNIE  
JOYCE KANSLER, as executor, FAIRFOX, LLC, a  
New York limited liability company, and SEYFAIR,  
LLC, a New York limited liability company,

Defendants.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05169 (CGM)

**NOTICE OF PRESENTMENT OF ORDER IMPLEMENTING JUDGMENT**

**PLEASE TAKE NOTICE** that pursuant to the Memorandum Decision Granting Summary Judgment in Favor of the Trustee in *Picard v. Fairfield Pagma Associates, LP*, Adv. Pro. No. 10-05169 (CGM), 2022 WL 1110560 (Bankr. S.D.N.Y. Apr. 13, 2022), ECF No. 137, dated April 13, 2022, and in accordance with Local Bankruptcy Rule 9074-1(a), Irving H. Picard, as trustee (the “Trustee”) for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–78lll, and the substantively consolidated estate of Bernard L. Madoff, through his undersigned counsel, will present the proposed judgment, attached hereto as **Exhibit A**, to the Honorable Cecelia G. Morris, United States Bankruptcy Judge, for settlement and signature on **April 22, 2022 at 12:00 p.m.**

**PLEASE TAKE FURTHER NOTICE** that to the extent there is a counter-proposed judgment or objection to the proposed judgment, it must be in writing, and be filed with the Clerk of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004, in by no later than **April 21, 2022 at 5:00 p.m.** (the “Objection Deadline”), with a courtesy copy delivered to the Chambers of the Honorable Cecelia G. Morris and served upon (a) Baker and Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan and Nicholas J. Cremona, and (b) Securities Investor Protection Corporation, 1667 K St. N.W., Suite 1000, Washington D.C. 20006-1620, Attn: Kevin H. Bell. Any objections to the proposed judgment must specifically state the interest that the objecting party has in these proceedings and the specific basis of any objection. Unless a counter-proposed judgment or written objection to the proposed judgment is received before the Objection Deadline, the proposed judgment may be signed and entered by the Court without further notice.

Dated: April 19, 2022  
New York, New York

By: /s/ David J. Sheehan  
**BAKER & HOSTETLER LLP**  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Nicholas J. Cremona  
Email: ncremona@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC  
and the Chapter 7 Estate of Bernard L. Madoff*